

AO91 (Rev. 11/11) Criminal Complaint

## United States District Court

for the

Southern District of Texas

UNITED STATES OF AMERICA )

V. )

Daniel GARCIA )

Adolfo ANDRADE-Escobedo )

Juan Pablo CARDENAS )

Ismael PEREZ-Luna )

Pedro BATRES )

Case Number: 5:18mj408-1

2

3

4

5

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 26, 2018 in the county of Webb in the  
(Date)Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

Title 8 United States Code, Section  
1324

Did unlawfully conspire to transport Mexican and Honduras nationals Jose MATA-Rangel, Wilson VASQUEZ-Lopez, Jose LOPEZ-Delgado, and Miguel SOLIMAN-Regaldo and eleven (11) other undocumented aliens by means of motor vehicle or otherwise within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and did transport or move or attempted to transport or move said aliens within the United States by means of transportation or otherwise in furtherance of such violation of law."

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet.

/s/ Albert Grooms

Complainant's Signature

Albert Grooms, HSI Special Agent

Printed Name and Title

Sworn to before me and signed in my presence,

Date: April 30, 2018

Judge's Signature

City and State: Laredo, Texas

Stephen Smith, U.S. Magistrate Judge

Printed Name and Title

UNITED STATES OF AMERICA

Page 2

V.

**Daniel GARCIA**

**Adolfo ANDRADE-Escobedo**

**Juan Pablo CARDENAS**

**Ismael PEREZ-Luna**

**Pedro BATRES**

**[CONT OF BASIS OF COMPLAINT]**

On April 26, 2018, law enforcement officers (LEOs) with Homeland Security Investigations (HSI), Customs and Border Protection (CBP) Office of Air and Marine (AMO), United States Border Patrol (USBP) and Laredo Police Department (LPD) were conducting surveillance on a tractor (TARGET VEHICLE) parked in the vicinity of Aguila Azteca Drive and Clark Boulevard in Laredo, Texas. The LEOs were conducting surveillance pursuant to information that the TARGET VEHICLE would be involved in human smuggling.

At approximately 12:55 pm, LEOs observed a black 2016 GMC 1500 pickup truck (VEHICLE 1) drive down to the south end of Aguila Azteca Drive. VEHICLE 1 then turned around and headed north and parked briefly on the side of the road. VEHICLE 1 then left Aguila Azteca Drive. driver of VEHICLE 1 was later identified as Daniel GARCIA.

At approximately 1:15 pm, LEOs observed a silver 2000 Chevrolet 1500 pickup (VEHICLE 2) approach the TARGET VEHICLE and drop off three (3) individuals who entered the TARGET VEHICLE. The driver of VEHICLE 2 was later identified as Ismael PEREZ-Luna. LEOs followed VEHICLE 2 and later conducted a traffic stop in the vicinity of Marcella Avenue and Corpus Christi Street in Laredo, Texas. LEOs took PEREZ-Luna into custody.

At approximately 1:35 pm, VEHICLE 1 was observed for a second time in the vicinity of the TARGET VEHICLE. VEHICLE 1 was observed parking approximately seventy-five (75) yards behind the TARGET VEHICLE and flashing its headlights. Approximately thirty-six (36) seconds after VEHICLE 1 flashed its lights, a red Jaguar (VEHICLE 3), black Ford Mustang (VEHICLE 4), and a grey GMC Sierra pickup (VEHICLE 5) pulled up to the TARGET VEHICLE and dropped off a total of twelve (12) people who got into the TARGET VEHICLE. LEOs observed several individuals exit each of the three (3) vehicles and enter the TARGET VEHICLE.

After VEHICLE 4 dropped off UDAs to the TARGET VEHICLE, LEOs followed VEHICLE 4 to Big Lots on Saunders Ave in Laredo, Texas, and took the driver (Juan Pablo CARDENAS) and passenger (Adolfo ANDRADE-Escobedo) into custody. Further investigation revealed ANDRADE-Escobedo had been driving VEHICLE 5 during the smuggling attempt before getting into VEHICLE 4 with CARDENAS.

After VEHICLE 1 dropped off UDAs to the TARGET VEHICLE, LEOs followed VEHICLE 1 to an apartment complex at E. Gustavus Street and Monterrey Avenue in Laredo, Texas. As VEHICLE 1 pulled up to the apartment complex LEOs attempted to conduct a traffic stop on the VEHICLE 1. VEHICLE 1 pulled out of the apartment complex heading north on Monterrey Avenue and then east on Clark. VEHICLE 1 stopped on Clark and GARCIA was taken into custody.

UNITED STATES OF AMERICA

Page 3

V.

**Daniel GARCIA**

**Adolfo ANDRADE-Escobedo**

**Juan Pablo CARDENAS**

**Ismael PEREZ-Luna**

**Pedro BATRES**

**[CONT OF BASIS OF COMPLAINT]**

An immigration inspection on the fifteen (15) individuals who entered the TARGET VEHICLE revealed that they were all citizens of another country with no legal right to enter into, or remain inside the United States. LEOs transported all individuals to the Laredo South USBP for further investigation.

CARDENAS (driver of vehicle 4) was advised of, and waived his MIRANDA rights. During an interview with HSI, CARDENAS stated he knew he was smuggling UDAs and expected to be paid for it. CARDENAS stated he had already received some money for gas. CARDENAS stated ANDRADE-Escobedo was driving VEHICLE 5 and dropped off UDAs at the TARGET VEHICLE. CARDENAS stated he picked up ANDRADE-Escobedo with VEHICLE 4 after ANDRADE-Escobedo parked VEHICLE 5 in the target parking lot. On April 27, 2018, LEOs located VEHICLE 5 in the Target parking lot.

CARDENAS stated he made an agreement with Pedro BATRES to smuggle UDAs and was instructed by BATRES to pick up the UDAs up at BATRES's RESIDENCE. VEHICLE 3 is registered to the same address CARDENAS provided as BATRES's RESIDENCE. Further investigation revealed that BATRES was a passenger of VEHICLE 3 during the human smuggling attempt.

PEREZ-Luna (driver of vehicle 2) was advised of, and waived his MIRANDA rights. During an interview with HSI PEREZ-Luna stated he knew he was smuggling UDAs and was going to be paid.

Jose MATA-Rangel, Wilson VASQUEZ-Lopez, Jose LOPEZ-Delgado, and Miguel SOLIMAN-Regaldo were among the UDAs apprehended from the TARGET VEHICLE and are being held as material witnesses (MATWITS). All of the MATWITS admitted to being citizens of Honduras and/or Mexico with no legal right to enter into, or remain in the United States. All of the MATWITS also stated they were paying various amounts of money to be smuggled to destinations within the United States.

Jose MATA-Rangel identified PEREZ-Luna via photographic lineup as the individual who was drove him to the TARGET VEHICLE. MATA-Randel stated PEREZ-Luna instructed him to get into the TARGET VEHICLE.

Wilson VASQUEZ-Lopez identified CARDENAS and ANDRADE-Escobedo via septate photographic lineups. VASQUEZ-Lopez stated he saw CARDENAS arrive at the stash house with ANDRADE-Escobedo and identified CARDENAS as the driver of VEHICLE 4. Wilson VASQUEZ-Lopez stated he was in VEHICLE 5 and identified ANDRADE-Escobedo as the driver of VEHICLE 5.

Jose LOPEZ-Delgado identified BATRES via photographic lineup. LOPEZ-Delgado stated BATRES showed up to the stash house LOPEZ-Delgado was being held at, and was the passenger of VEHICLE 3 when he (LOPEZ-Delgado) was dropped off at the TARGET VEHICLE.

Miguel SOLIMAN-Regaldo stated he was dropped off by VEHICLE 5 and got into the TARGET VEHICLE.

**[END]**